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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CORY HAZDOVAC, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

MERCEDES BENZ USA, LLC, and DOES
MBUSA 1 through 10, inclusive,

Defendants.

Case No. 20-cv-00377-RS

CLASS ACTION

**NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

**MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
JORDAN L. LURIE; AND [PROPOSED]
PRELIMINARY APPROVAL ORDER
FILED CONCURRENTLY**

Judge: Hon. Richard Seeborg

Date: December 4, 2025

Time: 1:30 p.m.

Courtroom: 3, 17th Floor

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on December 4, 2025 at 1:30 p.m., or as soon thereafter as the matter may be heard, before the Honorable Richard Seeborg in Courtroom 3, located at the United States District Court for the Northern District of California, San Francisco Division, 450 Golden Gate Avenue, San Francisco, California 94103, Plaintiff Cory Hazdovac (“Plaintiff”) on behalf of herself and all others similarly situated, will and hereby does, move for preliminary approval of the class action settlement in this case pursuant to Federal Rule of Civil Procedure 23(e).

Plaintiff requests the following relief:

1. Preliminary approval of the class action Settlement as set forth in the Settlement Agreement attached as Exhibit 1 to the Declaration of Jordan L. Lurie (“Lurie Decl.”), and all related notice and other deadlines as set forth in the agreement or as otherwise ordered by the Court subject to the terms and conditions of the Settlement Agreement, so that Plaintiff may then move the Court for Final Approval of the Settlement Agreement;
2. Conditional certification of the Settlement Class as defined in the Settlement;
3. The appointment of Jordan L. Lurie and Ari Y. Bassier of Pomerantz LLP, as Settlement Class Counsel;
4. The appointment of Plaintiff as the Class Representative;
5. An Order directing the dissemination of the notice of class action settlement to the Settlement Class as proscribed by the Settlement;
6. Appointment of a Settlement Administrator;
7. An Order setting a schedule for the dissemination of notice to the Settlement Class; deadlines for Settlement Class Members to opt-out of the Settlement; deadlines for Settlement Class Members to object to the Settlement or to enter an appearance through counsel; and for a Fairness Hearing to address final approval of the Class Action Settlement Agreement following the notice period; and,
8. Any other relief that the Court deems just and equitable under the circumstances.

This Motion is based upon this Notice, the accompanying Memorandum of Points and

1 Authorities, the Declaration of Jordan L. Lurie, and all documents and arguments in support
2 thereof.

3 Dated: November 13, 2025

Respectfully submitted,

4 **POMERANTZ LLP**
5 **FRONTIER LAW CENTER**

6 By: /s/ Ari Y. Basser

7 Jordan L. Lurie

Ari Y. Basser

8 Manny Starr

9 *Attorneys for Plaintiff and the Class*